

Ohio EPA Initial Comments
 South Dayton Dump OU2 RI Scoping Document, April 2013
 May 22, 2013Page 1

General Comments

- 1) A key part of the RI/FS scoping process, a conceptual site model, is missing from the scoping document. A conceptual site model should be developed for the site and added to the scoping process. Once we have a CSM, then the DQOs can be revised to guide the investigation.
- 2) The descriptions of the scope of the proposed investigations are incomplete and inconsistent between the report text and the DQO tables. There is not a clear outline of all contaminant routes and exposure pathways, and then appropriate screening levels for the pathways.

The floodplain investigation is used below as an example to illustrate the uncertainties and inconsistencies in the scoping document.

Flood Plain Investigation -- Proposed Field Activities, Section 3.5, Page 19 and DQOs in Table 3.6

Scope of Investigation

On Page 19 of the text, the second bullet under the description of Phase 1 specifies soil samples will be collected *"from two depth increments, i.e., 0 to 0.5 feet bgs and 1 to 2 feet bgs, which is relevant for data use in the OU2 RI Report and in the HHRA and ERA"*, however, it is not explained either in the text or in the DQO table why these two depths would be the appropriate sampling intervals. In DQO table Section 4ii (spatial boundaries) and Section 7i (sampling design) there is no mention of sampling depths to support the proposed sampling intervals.

Screening Levels

The text says *"the Phase 1 investigation of the GMR floodplain will include soil sample collection and analyses from the floodplain to identify direct contact risks..."* but does not identify appropriate screening levels for the floodplain soil data which would be used to identify those risks.

In the floodplain DQO table (Table 3.6), in different steps, different screening levels are specified as action levels. In Step 2i, the screening levels are listed as residential soil criteria &/or site-specific risk-based values. However, in Steps 3iii and 5ia, the action levels are just the residential soil RSLs, without mention of site-specific levels. In none of these steps are screening levels for eco risk mentioned, even though the question of ecological risk is listed as part of the problem description in Step 1i.

If site-specific risk-based screening values are proposed to be used for the site, as mentioned in Step 2i, the method of calculating these values needs to be specified, including any assumptions used within the calculations.

Sampling and analysis methods

Throughout the DQO tables, Section 3iv which should specify appropriate sampling and analysis is just a reference to the 2011 FSP. It would be helpful to list a specific reference to the specific section and/or SOP within the FSP for the particular sampling and analysis methods. Also, the DQO table should discuss how the analyses in the FSP will meet data quality level needed for action level decisions. This is important since the FSP was not necessarily written to address the levels of data quality necessary for this investigation.

Ohio EPA Initial Comments
 South Dayton Dump OU2 RI Scoping Document, April 2013
 May 22, 2013Page 2

Specific Comments

1) Page 1, Section 1.0 Introduction, second sentence

The text states *"The purpose of this document is to present a summary of available information and identify data needed to further characterize OU2 conditions for the OU2 RI."*

This statement should be expanded to clarify that the purpose of the RI is to determine the nature and extent of contamination and gather data for a human health and ecological risk assessment for OU2.

2) Page 1, Section 1.1 Site Location and Background, first sentence

The list of addresses for the site should be updated to include the address for Parcels 3753 and 4423, which are part of Jim City Salvage.

3) Page 2, Section 1.1.1 Ownership, last paragraph

The list of parcels within the south part of the site should also include Parcel 5178 (the quarry pond parcel).

4) Page 3, Section 1.1.1 Ownership, fourth paragraph

Parcel 3207 should not be included in the list of parcels owned by MCD, it is the Globe property.

5) Page 5, Section 1.2.2 Description of Parcel Groupings, table

The parcel grouping table appears to be incomplete. The Valley Asphalt and Dryden Road businesses parcels are missing from the table.

6) Page 6, Section 1.3 Report Objectives and Organization

A conceptual site model should be added to the document, between Section 1.0, site background and Section 2.0, evaluating existing data.

7) Page 7, Footnote 5

The footnote states:

"Waste classifications as described in OAC 3745-27, 29, 30, and 400, are based on visual observations. OAC waste classifications do not require analytical characterization."

This statement is incorrect. Waste characterization is not based on visual determinations. Please delete.

8) Page 8, Overview of OU2 Quarry Pond Parcels History and Fill Material Information, second paragraph

Within the description of the quarry pond, please add a discussion of how the quarry pond level is not static and that the pond may inundate the northeastern portion of the parcel during parts of the year.

9) Page 9, Overview of OU2 Quarry Pond Parcels History and Fill Material Information, fifth paragraph

Industrial Soil RSLs are not the only appropriate screening levels for the quarry pond sediment. Quarry pond data should be screened against ecological screening levels and also account for trespassers being in the pond and fishing in the pond.

10) Section 2.0 Summary of OU2 Investigation Results and Section 3.0 Proposed Field Investigation Activities

Additional comments are not provided on these sections because the information presented in these sections will need to be reevaluated once the CSM is established.